

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

V1 Jets International, Inc.,

Plaintiff,

- against -

Catlin Insurance Company, Inc.,

Defendant.

Index No. 12-CV-4646 (PGG)

ANSWER

Plaintiff, V1 JETS INTERNATIONAL, INC., hereby answers the allegations set forth in the Counterclaim as follows:

1. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-48 of the Amended Complaint as if fully incorporated herein, and denies all allegations contained in paragraphs 1-15 of Defendant's Answer to the extent that those allegations are inconsistent with the allegations set forth in paragraphs 1-48 of the Amended Complaint.

2. Plaintiff admits the allegations contained in paragraph 28.

3. Plaintiff admits the allegations contained in paragraph 29.

4. Plaintiff admits the allegations contained in paragraph 30.

5. Plaintiff admits the allegations contained in paragraph 31.

6. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32, except admits that Plaintiff notified Defendant of the damage to Cessna Aircraft Registration No. N810GA on or about June 18, 2010.

7. Plaintiff admits the allegations contained in paragraph 33, except denies that Plaintiff is, or at any time will be, obligated to pay any deductible.

8. Plaintiff admits the allegations contained in paragraph 34.

9. Plaintiff admits the allegations contained in paragraph 35, except denies that Plaintiff is, or at any time will be, obligated to pay any deductible.

10. Plaintiff admits the allegations contained in paragraph 36, except denies that Plaintiff is, or at any time will be, obligated to pay any deductible.


11. Plaintiff denies the allegations contained in paragraph 37. Plaintiff does not owe any deductible payments and therefore is not in breach of its Policy obligations.

12. Plaintiff denies the allegations contained in paragraph 38.

WHEREFORE Plaintiff V1 Jets International, Inc. respectfully requests the Court to enter judgment against Defendant:

- (i) Dismissing Defendant's counterclaim in its entirety; and
- (ii) Awarding such other and further relief that the Court deems just and proper.

Dated: September 7, 2012

By: 

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